
EXHIBIT 7

James A. Cooper, Ph.D.

May 11, 2023

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF TEXAS
WACO DIVISION

THE TRUSTEES OF PURDUE
UNIVERSITY,

Plaintiff,

vs. Civil Action No. 6:21-CV-00727-ADA

STMICROELECTRONICS
INTERNATIONAL N.V. and
STMICROELECTRONICS, INC.,

Defendants.

VIDEOTAPED DEPOSITION OF JAMES A. COOPER, Ph.D.

May 11, 2023

8:02 a.m.

100 Sandoval Street
Santa Fe, New Mexico

PURSUANT TO THE FEDERAL RULES OF CIVIL
PROCEDURE, this deposition was:

TAKEN BY: MR. MIKE BETTINGER
Attorney For Defendants

REPORTED BY: Peggy Jo Gonzales, RMR, CCR #145
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Professional Court Reporting Service
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(8287N-PJ)

May 11, 2023

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I N D E X

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1 Q. And there's a reference there to the Ph.D.
2 thesis proposal of Dr. Saha, and there's a July 17,
3 2004, date, correct?

4 A. That's correct.

5 Q. To your knowledge, did the thesis proposal
6 of Dr. Saha exist before July 17, 2004?

7 A. It did.

8 Q. When is the earliest date, to your
9 knowledge, that the thesis proposal existed?

10 A. I believe it's -- it's in February of 2004.

11 Q. And what is that -- what is that based on?

12 A. It's based on a copy of -- of an earlier
13 draft that is on my computer, with a metadata
14 creation date of February 2004.

15 Q. Thank you. You can put that aside.

16 Let me step back. There's been some
17 complaints or discussion in this case about the lack
18 of a signed thesis proposal. Let me ask you this:
19 Would you expect there to be a signed thesis
20 proposal?

21 A. No.

22 Q. Why not?

23 A. It was not our practice to sign the
24 document. The thesis proposal was not an official
25 university document, it was not deposited with the

1 university.

2 Q. What is the purpose of a thesis proposal,
3 then?

4 A. It's -- it's a written description that's
5 given to the advisory committee of the student, prior
6 to the oral exam, to serve as a basis for their
7 questions during the oral exam.

8 Q. Earlier today you were shown several prior
9 art references that were cited during prosecution of
10 the 633 patent. Do you recall that?

11 A. Okay, you're going to have to point me to
12 the ones you're referring to.

13 Q. Oh. For example, Exhibit 20 to Ono.
14 Exhibit 19. Exhibit 18.

15 A. Right, okay, I'm with you.

16 Q. Did you review these prior art references
17 in preparation for your deposition today?

18 A. No, I didn't.

19 Q. Sitting here today, did you have any
20 recollection of -- of this art?

21 A. I remember seeing some of these. I don't
22 have any recollection of the contents specifically.

23 Q. In testifying regarding these references,
24 was it your intention to provide any technical
25 analysis of this art today?

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CERTIFICATE OF COMPLETION OF VIDEOTAPED DEPOSITION

I, PEGGY JO GONZALES, New Mexico CCR #145, DO
HEREBY CERTIFY that on May 11, 2023, the deposition
of JAMES A. COOPER, Ph.D. was taken before me at the
request of, and sealed original thereof retained by:

Attorney for the Defendants
MR. MIKE BETTINGER
SIDLEY AUSTIN, LLP
555 California Street
San Francisco, California 94104
mbettinger@sidley.com 415.772.1224

I FURTHER CERTIFY that copies of this
certificate have been mailed or delivered to all
Counsel, and parties to the proceedings not
represented by counsel, appearing at the taking of
the deposition:

I FURTHER CERTIFY that examination of this
transcript and signature of the witness was requested
by the witness and all parties present.

On _____ a letter was mailed or delivered to
MR. JOHN P. LAHAD regarding obtaining signature of
the witness.

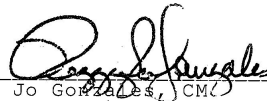
May 11, 2023

1 I FURTHER CERTIFY that the recoverable cost of
2 the original and one copy of the deposition,
3 including exhibits, to MR. MIKE BETTINGER is
4 \$_____.

5 I FURTHER CERTIFY that I did administer the oath
6 to the witness herein prior to the taking of this
7 deposition; that I did thereafter report in
8 stenographic shorthand the questions and answers set
9 forth herein, and the foregoing is a true and correct
10 transcript of the proceeding had upon the taking of
11 this deposition to the best of my ability.

12 I FURTHER CERTIFY that I am neither employed by
13 nor related to nor contracted with (unless excepted
14 by the rules) any of the parties or attorneys in this
15 case, and that I have no interest whatsoever in the
16 final disposition of this case in any court.

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Peggy Jo Gonzales, CMR

Peggy Jo Gonzales, RMR, CCR #145
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(8287N-PJ)
Date Taken: May 11, 2023
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